

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In Re:)	20-04773
)	
DEBBIE DOWNIE,)	Chapter 13
)	
Debtor.)	Hon. Judge: COX

NOTICE OF MOTION

To the following persons or entities who have been served via electronic mail:
U.S. Bankruptcy Trustee: USTPRegion11.ES.ECF@usdoj.gov
Marilyn O. Marshall, Chapter 13 Trustee: ecf@tvch13.net

To the following persons or entities who have been served via U.S. Mail: See attached list.

PLEASE TAKE NOTICE that on **January 25, 2021, at 9:00 A.M.**, I will appear before the Honorable Judge **COX**, or any judge sitting in that judge's place, and present the **Motion to Alter Order at Docket #39**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 273 2896** and the password is **778135**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

PROOF OF SERVICE

The undersigned certifies that copies of this Notice and attachments were served to the listed persons or entities, if service by mail was indicated above, by depositing same in the U.S. Mail at Wheeling, Illinois 60090, on or before December 31, 2020, at 5:30 p.m., with proper postage prepaid, unless a copy was provided electronically by the Bankruptcy Court.

DATE OF SERVICE: December 31, 2020

/s/ Robert C. Bansfield Jr.

Robert C. Bansfield Jr., A.R.D.C. #6329415

Attorney for the Debtor(s)
DAVID M. SIEGEL & ASSOCIATES
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100
rbansfield@davidmsiegel.com

To the following persons or entities who have been served via U.S. Mail:

Debbie Downie
1415 W. 123rd St., #2
Calumet Park, IL 60827

Illinois Department of Employment
PO Box 4385
Chicago, IL 60680

Speedy Rapid Cash
PO Box 780408
Wichita, KS 67278

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W. Jackson Ste. 600
Chicago, IL 60604

Peoples Gas Light & Coke Company
200 East Randolph Street
Chicago, Illinois 60601

Nicor Gas
PO Box 549
Aurora, IL 60507

Zalutsky & Pinski, Ltd
111 W. Washington St., Ste. 1550
Chicago, IL 60602

Premier Bankcard, LLC
Jefferson Capital Systems LLC Assignee
Po Box 7999
Saint Cloud, MN 56302-9617

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
Oak Brook Terrace, IL 60523

Portfolio Recovery Associates, LLC
c/o Progress One Financial, LLC
POB 41067
Norfolk, VA 23541

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Illinois Department of Revenue
PO Box 19035
Springfield, IL 62794-9035

Federal Loan Servicing
PO box 69184
Harrisburg, PA 17106-9184

**UNITED STATES BANKRUPTCY COURT
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In Re:)	20-04773
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DEBBIE DOWNIE,)	Chapter 13
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MOTION TO ALTER ORDER AT DOCKET #39

NOW COMES the Debtor, **Debbie Downie**, by and through her attorneys, DAVID M. SIEGEL AND ASSOCIATES, to present this Motion, and in support thereof state as follows:

- 1) Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
- 2) On February 21, 2020, the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, and the Chapter 13 plan was confirmed on June 1, 2020. Tom Vaughn was appointed Trustee in this case.
- 3) On October 5, 2020, the Court granted Debtor's Motion to Modify Chapter 13 Plan (Docket #35), which requested to both defer Debtor's default at that time and decrease the Debtor's monthly plan payment.
- 4) The order entered by the Court (Docket #39) inadvertently did not include language deferring the Debtor's plan payment default at the time the motion was granted despite the clear intention of the motion based on the prayer of relief included in that motion.
- 5) The Debtor seeks to amend the October 5, 2020, order modifying the Debtor's plan to defer the default, nunc pro tunc.
- 6) This proposal is made in good faith and without the intent to defraud creditors.

WHEREFORE, the Debtor, **Debbie Downie**, prays that this Honorable Court amend the Order entered October 5, 2020, to include language deferring the Debtor's plan payment default and for such other and further relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Robert C. Bansfield Jr.
Robert C. Bansfield Jr., A.R.D.C. #6329415
Attorney for the Debtors

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